

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 22-cr-348 (JNE/LIB)

---

United States of America,

Plaintiff,

vs.

**DEFENDANT'S MOTION TO  
MODIFY CONDITIONS OF RELEASE**

Gale Allen Rachuy,

Defendant.

---

Defendant Gale Allen Rachuy, by and through his attorney, hereby requests the Court modify his conditions of his release to vacate the home detention/GPS monitoring conditions based on his continued compliance.

1. The Order Setting Conditions of Release [Doc. 13] was entered December 19, 2022, placing Mr. Rachuy in a halfway house [Para. 7(j)]. The Order Modifying Conditions of Release [Doc. 45] was subsequently entered on April 14, 2023, removing the halfway house condition, and placing Mr. Rachuy on home detention with GPS monitoring [Para. 7(p)]. USPO Matthew Koppes confirms Mr. Rachuy remains in compliance with the Court's orders, has appeared for all his court hearings, and is considered a low flight risk.
2. AUSA Harry Jacobs and USPO Matthew Koppes do not oppose this request.
3. A proposed Order accompanies this motion.

Respectfully Submitted,

Dated: June 12, 2023

/s/ Christopher Keyser  
Christopher Keyser (0389361)  
400 South Fourth Street, Suite 806M  
Minneapolis, Minnesota 55415  
Phone: (612) 338-5007  
Fax: (612) 454-2775  
E-mail: chris@keyserdefense.com